

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE INJECTAFER PRODUCTS LIABILITY
LITIGATION**

This Document Relates To:

Adams v. Luitpold Pharmaceuticals, Inc., 2:21-cv-03454-WB
Armendariz v. Luitpold Pharmaceuticals, Inc., 2:21-cv-02839-WB
Edwards v. Luitpold Pharmaceuticals, Inc., 2:21-cv-00067-WB
Ervin v. Luitpold Pharmaceuticals, Inc., 2:21-cv-01951-WB
Kessler v. Luitpold Pharmaceuticals, Inc., 2:21-cv-00746-WB
Marullo v. Luitpold Pharmaceuticals, Inc., 2:21-cv-03002-WB
Moore v. Luitpold Pharmaceuticals, Inc., 2:21-cv-01952-WB
Raymond v. Luitpold Pharmaceuticals, Inc., 2:20-cv-03004-WB
Rutherford v. Luitpold Pharmaceuticals, Inc., 2:21-cv-04920-WB
Smith v. Luitpold Pharmaceuticals, Inc., 2:21-cv-00601-WB
Ward v. Luitpold Pharmaceuticals, Inc., 2:21-cv-02489-WB
Whitehead v. Luitpold Pharmaceuticals, Inc., 2:21-cv-03364-WB
Whitlock v. Luitpold Pharmaceuticals, Inc., 2:21-cv-02487-WB

EASTERN DISTRICT OF
PENNSYLVANIA

PHILADELPHIA
DIVISION

CIVIL ACTION NO.

2:19-CV-00276-WB

**PLAINTIFFS' UNOPPOSED MOTION TO ESTABLISH A
QUALIFIED SETTLEMENT FUND AND TO APPOINT A QSF ADMINISTRATOR**

Plaintiffs Adams, Armendariz, Edwards, Ervin, Kessler, Marullo, Moore, Raymond, Rutherford, Smith, Ward, Whitehead, and Whitlock ("Plaintiffs"), by and through their counsel Robins Kaplan LLP ("Plaintiffs' Counsel"), respectfully move this Court for an Order to establish a Qualified Settlement Fund, to be legally titled the Robins Kaplan INJ Qualified Settlement Fund ("RK QSF"), pursuant to the terms of a Confidential Settlement Agreement and within the meaning of section 468B of the Internal Revenue Code of 1986, as amended, and Treasury Regulation

sections 1.468B-1, *et seq.*, and to appoint an administrator for the RK QSF. In support of their Motion, Plaintiffs incorporate the attached Memorandum in Support of their Motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter an Order in the form attached, establishing a Qualified Settlement Fund and appointing a Qualified Settlement Fund Administrator.

Dated: October 25, 2023

Respectfully submitted,

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